

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

FILED

JUN 18 2025

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MONTEZ MOORE

a/k/a Tez,

a/k/a 819tezz

DUANE BENSON

a/k/a Wayne

a/k/a foeel ne_

ANIYA SHEPERD

a/k/a Moo-Moo

a/k/a mooslappin,

a/k/a mooslime,

BRANDON IRONS

a/k/a Lil B

a/k/a Brando

a/k/a solofrm19_

a/k/a mostwanted_35

ALLEN BROWN

a/k/a Tre

MARKAVEON JACKSON

a/k/a Black

RAYNELL MOORE

a/k/a Smokey

a/k/a Smokey Dub

LAVATRICE McCULLY-COLLINS

a/k/a Fuzz

PEANTAY RODDY

a/k/a Tay

a/k/a pusha.tayy, and

NOAH HORNBURG

a/k/a White Boy

a/k/a runituptilligo,

Defendants.

No. S1-4:24-CR-00233-HEA

FIRST SUPERSEDING INDICTMENT

COUNT ONE
(RICO Conspiracy)

The Grand Jury for the Eastern District of Missouri charges, at all times relevant to this indictment, that:

Introduction

The Strikers Enterprise

1. The Strikers was an organization based in the Eastern District of Missouri that engaged in car dealership burglaries, motor vehicle thefts, transportation of stolen vehicles across state lines, possession and sale of stolen vehicles, shootings, carjackings, robberies, and other criminal acts in Missouri, Illinois, and elsewhere from at least in or about September 2023 until at least in or about March 2024. The organization used the term “Strikers” to refer to their group, its members and associates, and stolen vehicles. Members of the organization committed violent crimes with, or sold, the vehicles that the group had stolen.

2. The Strikers, including its leaders, members, and associates, constituted an enterprise, as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce (“the Strikers Enterprise,” “the Strikers,” “the enterprise”). The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. Members and associates of the enterprise had loosely defined roles as buyers, drivers, lookouts, and organizers. The enterprise coordinated and communicated extensively before and after their crimes, often by text or social media. Members and associates of the enterprise relied on one another for research and information to identify victims and targets and joined in the commission of the crimes. In planning the burglaries, the Strikers researched car

dealerships using online and in-person surveillance. Members and associates of the enterprise participated in the burglaries based on their availability, expertise, and interest.

4. The Strikers generally followed a standard operating procedure during the burglaries:

- i. Members and associates committed the burglaries late at night, while the dealerships were closed;
- ii. Members and associates concealed their identity using masks, gloves, and hooded clothing;
- iii. Members and associates typically arrived in a previously stolen vehicle that they often left behind after completing the burglary; and
- iv. Members and associates broke into dealerships, located the key lockbox, stole the key fobs, and drove off in stolen high-end vehicles.

5. Strikers members and associates sometimes burglarized multiple dealerships in one area, in one night, using one crew. The enterprise planned crimes, transported members and associates to the target locations, communicated with one another, coordinated movements, provided security to one another, and committed violence on behalf of the enterprise. Strikers members and associates stored, secreted and sold the stolen vehicles. Members and associates sold stolen vehicles to one another and to third parties and advertised them to the public for sale. The Strikers members and associates also used the stolen vehicles to commit other crimes.

6. The Strikers members and associates frequently promoted their lifestyle and crimes online, advertising their illicit gains on social media and in music videos.

7. The Strikers members and associates sometimes supplied and received payment in firearms in exchange for stolen vehicles.

Purposes of the Enterprise

8. The purposes of the Strikers enterprise included, but were not limited to:

- a. Enriching members and associates of the enterprise through burglaries, robberies, carjackings, and the interstate transport, possession, and sale of stolen goods and vehicles;
- b. Providing protection and assistance to members and associates who committed crimes on behalf of the enterprise; and
- c. Hindering, obstructing, and preventing law enforcement from identifying, apprehending, and prosecuting participants in the enterprise's criminal activity.

Means and Methods of the Enterprise

9. Among the means and methods by which members and associates of the Strikers conducted and participated in the conduct of the affairs of the enterprise included, but were not limited to, the following:

- a. Members and associates generated income by working together to engage in burglary, robbery, carjacking, and the interstate transport, possession, and sale of stolen goods and vehicles, along with other illegal activities;
- b. Members and associates conducted online and physical surveillance of target car dealerships before they forced entry into the dealerships;
- c. Members and associates sought out high-end vehicles, such as Dodge SRT Scat models, Dodge Hellcats, Dodge Trackhawks, BMWs, Audis, and Mercedes-Benzenes;
- d. Members and associates often arrived at a targeted dealership in cheaper, previously stolen vehicles that they often left behind after burglarizing the dealership;

e. Members and associates sought to spend no more than a few minutes at a dealership from which they were stealing vehicles to avoid unwanted attention or police detection;

f. Members and associates monitored police activity prior to the commission of their burglaries to avoid detection and arrest;

g. Members and associates concealed their identities during burglaries using dark colored or hooded clothing, face masks, and gloves;

h. Members and associates communicated via walkie talkie, group Facetime calls and other forms of social media before, during, and after burglaries;

i. After stealing vehicles, members and associates of the enterprise concealed the stolen nature or location of the vehicles by, for example, placing stolen out-of-state dealer license plates onto the newly stolen vehicles, covering or removing Vehicle Identification Numbers (VINs) from the stolen vehicles, damaging or removing the rearview mirrors, and removing tracking devices throughout the vehicles;

j. Members and associates hid and stored stolen vehicles in areas that they believed were safe from police detection;

k. Members and associates offered the stolen vehicles to the public for sale on social media and sold them to other members and associates for cash;

l. Members and associates used the stolen vehicles to commit other crimes, including other burglaries and shootings;

m. Members and associates acquired, shared, carried, and used firearms for protection and to commit crimes;

n. Members and associates sometimes supplied and received payment in firearms in exchange for stolen vehicles; and

o. Members and associates of the enterprise misrepresented, concealed, and used coded language and other means of communication to avoid detection and apprehension by law enforcement authorities.

The Racketeering Conspiracy

10. Beginning on a date unknown, but since at least in or about September 2023 until March 2024, in the Eastern District of Missouri and elsewhere, defendants **MONTEZ MOORE, DUANE BENSON, ANIYA SHEPERD, BRANDON IRONS, ALLEN BROWN, MARKAVEON JACKSON, RAYNELL MOORE, LAVATRICE McCULLY-COLLINS, PEANTAY RODDY, and NOAH HORNBURG**, with others known and unknown, each being employed by and associated with the “Strikers,” an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did unlawfully and knowingly combine, conspire, confederate, and agree with each other to violate Title 18, United States Code, Section 1962(c), that is to conduct and participate, directly and indirectly, in the conduct of the affairs of the Strikers Enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of:

- a. multiple acts involving robbery, chargeable under Missouri Revised Statute §§ 570.023, 570.027, 562.041, 562.012, and 562.014;
- b. multiple acts involving murder, chargeable under Missouri Revised Statute §§ 565.020, 565.021, 562.041, 562.012, and 562.014;
- c. multiple acts indictable under Title 18, United States Code, Sections 2312 and 2313 (relating to interstate transportation of stolen motor vehicles); and
- d. multiple acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion).

11. It was further part of the conspiracy that each defendant agreed that a co-conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

12. In furtherance of the conspiracy, and to affect the object thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed the below acts, among others, in the Eastern District of Missouri and elsewhere.

13. On or about September 10, 2023, members and associates of the Strikers purchased a stolen vehicle (valued at approximately \$80,000) for \$1,000.

14. On or about September 24, 2023, **BRANDON IRONS, MARKAVEON JACKSON**, and other members and associates of the Strikers stole a vehicle worth approximately \$10,000 in Missouri and drove it across state lines to a McGinley Chrysler dealership in Highland, Illinois.

15. On or about September 24, 2023, after arriving in Illinois, **BRANDON IRONS, MARKAVEON JACKSON**, and other members and associates of the Strikers burglarized the McGinley Chrysler dealership, stole three high-end vehicles worth approximately \$141,000, and abandoned the vehicle that they stole in Missouri.

16. On or about September 24, 2023, **BRANDON IRONS, MARKAVEON JACKSON**, and other members and associates of the Strikers drove the three stolen vehicles from the McGinley Chrysler dealership across state lines to Missouri.

17. On or about September 27, 2023, **PEANTAY RODDY** offered one of the vehicles stolen from McGinley Chrysler for sale in Missouri.

18. On or about October 1, 2023, **BRANDON IRONS, MARKAVEON JACKSON**, and other members and associates of the Strikers stole a vehicle worth approximately \$10,000 and drove it across state lines from Missouri to Illinois.

19. That same night, on or about October 1, 2023, **BRANDON IRONS, MARKAVEON JACKSON**, and other members and associates of the Strikers abandoned the stolen vehicle at Jack Schmitt Chevrolet in O'Fallon, Illinois and stole four vehicles worth approximately \$89,000.

20. On or about October 1, 2023, **BRANDON IRONS, MARKAVEON JACKSON**, and other members and associates of the Strikers drove the four stolen vehicles taken from Jack Schmitt Chevrolet across state lines to Missouri.

21. On or about October 1, 2023, **MARKAVEON JACKSON**, and other members and associates of the Strikers burglarized David Taylor Chrysler in Ellisville, Missouri and stole four high-end Dodge vehicles worth approximately \$230,000.

22. From on or about October 1, 2023, until on or about November 20, 2023, **LAVATRICE McCULLY COLLINS** possessed a vehicle after it had been stolen from Jack Schmitt Chevrolet and transported from Illinois to Missouri.

23. On or about October 2, 2023, **NOAH HORNBURG** told another person that he planned to sell off his inventory of vehicles because the Strikers were going to "get some new (cars)."

24. From on or about October 2, 2023, until on or about October 8, 2023, **LAVATRICE McCULLY-COLLINS, BRANDON IRONS, ANIYA SHEPERD, NOAH HORNBURG**, and other members and associates of the Strikers discussed, sold, and attempted to sell various vehicles stolen by the group.

25. On or about October 8, 2023, **BRANDON IRONS, ANIYA SHEPERD, RAYNELL MOORE**, and other members and associates of the Strikers planned to steal a vehicle for use in the Strikers' next burglary.

26. On or about October 9, 2023, **ANIYA SHEPERD, BRANDON IRONS, PEANTAY RODDY, RAYNELL MOORE**, and other members and associates of the Strikers stole a vehicle in Brentwood, Missouri, worth approximately \$15,000, and drove it to Nissan Auto Centers in Herculaneum, Missouri.

27. On or about October 9, 2023, **ANIYA SHEPERD, BRANDON IRONS, PEANTAY RODDY, RAYNELL MOORE**, and other members and associates of the Strikers burglarized Nissan Auto Centers and stole four vehicles worth approximately \$62,000.

28. On or about October 9, 2023, **ANIYA SHEPERD, BRANDON IRONS, PEANTAY RODDY, RAYNELL MOORE**, and other members and associates of the Strikers drove a vehicle stolen from Nissan Auto Centers across state lines to Quality Dodge in Jerseyville, Illinois.

29. On or about October 9, 2023, **ANIYA SHEPERD, BRANDON IRONS, PEANTAY RODDY, RAYNELL MOORE**, and other members and associates of the Strikers burglarized Quality Dodge and stole a vehicle valued at approximately \$21,000.

30. On or about October 9, 2023, **ANIYA SHEPERD, BRANDON IRONS, PEANTAY RODDY, RAYNELL MOORE**, and other members and associates of the Strikers attempted to burglarize Jack Schmitt Chevrolet in Wood River, Illinois, causing approximately \$2,500 in damage.

31. On or about October 9, 2023, **ANIYA SHEPERD, BRANDON IRONS, PEANTAY RODDY, RAYNELL MOORE**, and other members and associates of the Strikers, drove two stolen vehicles across state lines from Illinois to Missouri.

32. Between on or about October 9, 2023, and October 10, 2023, **ANIYA SHEPERD, NOAH HORNBURG, BRANDON IRONS, PEANTAY RODDY**, and other members and associates of the Strikers discussed the Strikers' inventory of stolen vehicles taken in Missouri and Illinois on October 9, 2023.

33. On or about October 11, 2023, **PEANTAY RODDY** and other members and associates of the Strikers planned a car dealership burglary.

34. On or about October 12, 2023, **ANIYA SHEPERD, BRANDON IRONS, PEANTAY RODDY**, and other members and associates of the Strikers, drove a stolen vehicle, which had previously crossed state lines, to John Morlan Chrysler in Cape Girardeau, Missouri.

35. On or about October 12, 2023, **ANIYA SHEPERD, BRANDON IRONS, PEANTAY RODDY**, and other members and associates of the Strikers burglarized John Morlan Chrysler and stole seven vehicles worth approximately \$855,000. They also stole 46 Missouri dealer plates and abandoned the stolen vehicle they arrived in at the dealership.

36. After the burglary on or about October 12, 2023, **ANIYA SHEPERD** posted a video on social media depicting the Strikers' possession of the vehicles stolen from John Morlan Chrysler and a separate video of her and **DUANE BENSON** in a car brandishing firearms equipped with extended magazines and switches.

37. On or about October 12, 2023, during sale negotiations, **NOAH HORNBURG** offered **ANIYA SHEPERD** cash and firearms in exchange for stolen vehicles from John Morlan Chrysler.

38. On or about October 13, 2023, **NOAH HORNBURG** purchased two high-end Dodges from **BRANDON IRONS** and **ANIYA SHEPERD** stolen by the Strikers from John Morlan Chrysler.

39. On or about October 14, 2023, **BRANDON IRONS**, **PEANTAY RODDY**, and other members and associates of the Strikers planned a burglary.

40. On or about October 15, 2023, members and associates of the Strikers fled from police and ultimately abandoned a stolen vehicle that they had been using since about September 10, 2023.

41. On or about October 16, 2023, **ANIYA SHEPERD**, **DUANE BENSON**, and other members and associates of the Strikers planned to steal back the stolen vehicle impounded by police the day before.

42. On or about October 16, 2023, Strikers members and associates stole back the stolen vehicle from the impound lot.

43. From on or about November 15, 2023, through on or about November 16, 2023, **BRANDON IRONS**, **PEANTAY RODDY**, **LAVATRICE McCULLY-COLLINS**, and other members and associates of the Strikers planned a future car dealership burglary.

44. On or about November 17, 2023, at approximately 12:30 a.m., **BRANDON IRONS**, **DUANE BENSON**, **RAYNELL MOORE**, and other Strikers members and associates got together.

45. On or about November 17, 2023, at approximately 3:00 a.m., members and associates of the Strikers drove a vehicle stolen in St. Louis, Missouri to a downtown St. Louis Hampton Inn and broke into multiple vehicles in the hotel's parking lot.

46. On or about November 17, 2023, at approximately 3:15 a.m., members and associates of the Strikers departed the Hampton Inn parking lot while being pursued by a hotel employee. Shortly after, at least two members or associates of the Strikers got out of their stolen vehicle and fired multiple rounds at the pursuing employee.

47. On or about November 19, 2023, **BRANDON IRONS, LAVATRICE McCULLY-COLLINS**, and other members and associates of the Strikers stole a vehicle, worth approximately \$8,000, from Webster Groves, Missouri to take to Illinois and commit another burglary.

48. On or about November 20, 2023, **BRANDON IRONS**, and other Strikers members and associates then drove the stolen vehicle across state lines to Dream Team Nissan in Wood River, Illinois, where they abandoned it. There they stole a vehicle worth approximately \$22,000 and drove it across state lines to Missouri.

49. On or about November 23, 2023, **ANIYA SHEPERD, RAYNELL MOORE**, and other Strikers members and associates possessed the vehicle stolen from Dream Team Nissan.

50. On or about November 25, 2023, members and associates of the Strikers put a license plate stolen from John Morlan Chrysler in Missouri on the vehicle stolen from Dream Team Nissan in Illinois.

51. On or about November 29, 2023, **NOAH HORNBURG, ANIYA SHEPERD**, and other members and associates of the Strikers warned one another of law enforcement activity in the region.

52. On or about December 4, 2023, **ANIYA SHEPERD** and other members and associates of the Strikers planned to buy gloves and masks from Walmart to conceal their identity at future burglaries.

53. On or about December 5, 2023, **DUANE BENSON, ANIYA SHEPERD, MONTEZ MOORE, BRANDON IRONS**, and other members and associates of the Strikers drove a vehicle stolen in St. Louis, Missouri and worth approximately \$20,000 to Sam Scism Ford in Farmington, Missouri.

54. On or about December 5, 2023, **DUANE BENSON, ANIYA SHEPERD, MONTEZ MOORE, BRANDON IRONS**, and other members and associates of the Strikers burglarized the Sam Scism Ford car dealership, stole four vehicles worth approximately \$170,000, and left behind the vehicle they had arrived in.

55. Later that same day, **DUANE BENSON, ANIYA SHEPERD**, and other members and associates of the Strikers offered the four stolen vehicles for sale.

56. On or about December 6, 2023, **DUANE BENSON, ANIYA SHEPERD, MONTEZ MOORE, ALLEN BROWN**, and other members and associates of the Strikers drove a stolen vehicle taken from Sam Scism Ford in Missouri across state lines to Isringhausen BMW in Springfield, Illinois.

57. On or about December 6, 2023, **DUANE BENSON, ANIYA SHEPERD, MONTEZ MOORE, ALLEN BROWN**, stole six high-end vehicles worth approximately \$325,000 from Isringhausen BMW. They abandoned the stolen vehicle they arrived in and drove the vehicles taken from Isringhausen BMW across state lines to Missouri.

58. On or about December 6, 2023, **ALLEN BROWN** possessed two vehicles stolen hours earlier from Isringhausen BMW.

59. On or about December 6, 2023, **ANIYA SHEPERD** offered an “all new” BMW for sale.

60. On or about December 7, 2023, **NOAH HORNBURG** sold a BMW stolen by the Strikers on December 5, 2023, to a third-party. That same day, **NOAH HORNBURG** offered at least three other stolen vehicles for sale.

61. On or about December 8, 2023, **MONTEZ MOORE**, **ANIYA SHEPERD**, **DUANE BENSON**, and other members and associates of the Strikers burglarized BMW of West St. Louis in Manchester, Missouri, but did not steal any vehicles.

62. On or about December 8, 2023, **MONTEZ MOORE**, **ANIYA SHEPERD**, **DUANE BENSON**, and other members and associates of the Strikers burglarized Dean Team Hyundai in Ballwin, Missouri and stole four high-end vehicles worth approximately \$140,000.

63. On or about December 8, 2023, **ANIYA SHEPERD**, **DUANE BENSON**, and **NOAH HORNBURG** negotiated the sale of vehicles stolen by the Strikers in the past three days.

64. On or about December 8, 2023, **DUANE BENSON**, **RAYNELL MOORE**, **ANIYA SHEPERD**, **MONTEZ MOORE**, and other members and associates of the Strikers brandished firearms while posing for photographs in front of some of the vehicles stolen from Dean Team Hyundai.

65. On or about December 23, 2023, **NOAH HORNBURG** asked **DUANE BENSON** whether he had “something fast,” and **BENSON** responded that he only had the blue BMW 330i stolen in Illinois on December 6, 2023.

66. Between January 5, 2024, and January 12, 2024, **MONTEZ MOORE**, **DUANE BENSON**, **BRANDON IRONS**, and other members and associates of the Strikers, used the stolen blue BMW 330i to commit a series of vehicle break-ins at various businesses in Florissant, Webster Groves, and Des Peres, Missouri.

67. On or about January 15, 2024, **MONTEZ MOORE** and **DUANE BENSON** drove the stolen blue BMW 330i to a gas station in Cool Valley, Missouri, robbed a lottery game technician at gunpoint of approximately \$20,000 in cash and tools, and carjacked a white 2023 Chevrolet Silverado pickup truck worth approximately \$49,000.

68. On or about January 17, 2024, **NOAH HORNBURG** requested that **DUANE BENSON** and the Strikers members and associates find and steal two specific vehicles.

69. On or about January 19, 2024, **BRANDON IRONS** and **MONTEZ MOORE** planned a burglary.

70. On or about January 20, 2024, **MONTEZ MOORE**, **DUANE BENSON**, **BRANDON IRONS**, and other members and associates of the Strikers drove the blue BMW 330i to Lucas Smith Dodge in Festus, Missouri and stole four high-end vehicles worth approximately \$200,000.

71. On or about January 21, 2024, **DUANE BENSON** sold a stolen vehicle to **NOAH HORNBURG** and **HORNBURG** requested that the Strikers find and steal specific Dodge models including Trackhawks, TRXs, and hellcat Durangos.

72. On or about January 21, 2024, shortly after the request by **NOAH HORNBURG**, **MONTEZ MOORE**, **BRANDON IRONS**, and other members and associates of the Strikers drove the stolen blue BMW 330i to David Taylor Chrysler in Belleville, Illinois and fled from the police back to Missouri at speeds of over 110 mph.

73. On or about January 21, 2024, **MONTEZ MOORE**, **BRANDON IRONS**, and other members and associates of the Strikers drove the stolen blue BMW 330i to burglarize David Taylor Chrysler in Ellisville, Missouri, but did not steal any vehicles.

74. On or about January 22, 2024, **MONTEZ MOORE** and other members and associates of the Strikers drove the stolen blue BMW 330i to Master Cars Inc. in Granite City, Illinois, but did not steal any vehicles.

75. On or about January 23, 2024, **DUANE BENSON** offered multiple vehicles stolen by the Strikers for sale online.

76. On or about January 24, 2024, **DUANE BENSON**, along with other members and associates of the Strikers, stole a vehicle from All-Star Dodge in Bridgeton, Missouri worth approximately \$30,000. **BENSON** then attempted to sell that vehicle to **NOAH HORNBURG** and others online.

77. On or about January 29, 2024, **NOAH HORNBURG** requested that the Strikers find and steal high-end Dodge Models, like SRT 300s.

78. In or about February and March 2024, **BRANDON IRONS** and **MONTEZ MOORE** planned future burglaries.

79. On or about March 25, 2024, **DUANE BENSON** posted rap videos on social media depicting multiple vehicles stolen from Isringhausen BMW on or about December 6, 2023.

80. On or about March 30, 2024, **BRANDON IRONS** asked a third party to delete a rap video, released in November 2023, in which he appeared with **ANIYA SHEPERD** and another Strikers member/associate.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO
(Carjacking)

The Grand Jury further charges that:

81. On or about January 15, 2024, within the Eastern District of Missouri,

MONTEZ MOORE and

DUANE BENSON,

while aiding and abetting each other, with the intent to cause death and serious bodily harm, took a motor vehicle, that is, a white 2023 Chevrolet Silverado, that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of another, by force, violence, and intimidation.

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT THREE

(Possessing and Brandishing a Firearm in furtherance of a Crime of Violence)

The Grand Jury further charges that:

82. On or about January 15, 2024, within the Eastern District of Missouri,

**MONTEZ MOORE and
DUANE BENSON,**

the Defendants, aiding and abetting each other, knowingly possessed and brandished a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, carjacking as charged in Count Two.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FOUR

(Robbery Obstructing, Delaying, or Affecting Interstate Commerce)

The Grand Jury further charges that:

83. On or about January 15, 2024, within the Eastern District of Missouri,

**MONTEZ MOORE and
DUANE BENSON,**

the Defendants, aiding and abetting each other, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce, or attempt to do so, by the robbery of K.G., an employee of Torch Electronics, LLC, which is a commercial establishment engaged in interstate

or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE
(Possessing and Brandishing a Firearm in furtherance of a Crime of Violence)

The Grand Jury further charges that:

84. On or about January 15, 2024, within the Eastern District of Missouri,

**MONTEZ MOORE and
DUANE BENSON,**

the Defendants, aiding and abetting each other, knowingly possessed and brandished a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, obstructing, delaying, or affecting commerce, or attempting to do so, by robbery, as charged in Count Four.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SIX
(Possessing a Machinegun)

The Grand Jury further charges that:

85. On or about December 16, 2023, within the Eastern District of Missouri,

ANIYA SHEPERD,

did knowingly possess a machinegun.

In violation of Title 18, United States Code, Section 922(o).

FORFEITURE ALLEGATION

The Grand Jury further finds that:

1. Upon conviction of the offense alleged in Count One of this First Superseding

Indictment, the defendant(s), **MONTEZ MOORE, DUANE BENSON, ANIYA SHEPERD, BRANDON IRONS, ALLEN BROWN, MARKAVEON JACKSON, RAYNELL MOORE, LAVATRICE McCULLY-COLLINS, PEANTAY RODDY, and NOAH HORNBERG** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963:

- a. any interest acquired and maintained in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);
- b. any interest in, security of, claims against, and property and contractual rights of any kind affording a source of influence over, the enterprise which the defendant has established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); or
- c. any property constituting and derived from any proceeds which the defendant obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

2. Pursuant to Title 18, United States Code, Sections 982(a)(5)(C) & 924, and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 2119 as set forth in Count Two, the defendants shall forfeit to the United States of America any property, real or personal, which represents or is traceable to the gross

proceeds obtained, directly or indirectly, as a result of such offense, and any firearms or ammunition intended to be used in such offense.

3. Pursuant to Title 18, United States Code, Sections 924 and 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 1951 as set forth in Count Four, the defendants shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said violation and any firearm or ammunition involved in or used or intended to be used in such violation.

4. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 922(o) or 924(c)(i)(A)(ii) as set forth in Counts Three, Five and Six, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or used in said violation(s).

5. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, which represents or is traceable to the proceeds obtained, directly or indirectly, as a result of the offenses set forth in Counts One, Two and Four.

6. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of any property of the defendant(s) up to the value of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

MATTHEW DRAKE
Acting United States Attorney
Eastern District of Missouri

DAVID L. JAFFE
Chief, Violent Crime and Racketeering Section
U.S. Department of Justice

NINO PRZULJ, #68334MO
Assistant United States Attorney
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JARED A. HERNANDEZ, #48404FL
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